



April 29, 2024

**Via ECF**

The Honorable Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations,  
No. 20-CV-8924*

*This Filing is Related to: Payne v. de Blasio, 20 Civ. 8924; Gray, et al v. City of New York, et al, No. 21-cv-06610; and Rolon, et al v. City of New York, et al, No. 21-cv-2548.*

Dear Judge McMahon:

We represent the Payne plaintiffs in this matter and write jointly on behalf of the City of New York defendants and plaintiffs in *Gray* and *Rolon* matters to seek an extension of the plaintiffs' time to move for reasonable attorney's fees, expenses and costs related to their injunctive claims until May 15, 2024.

On April 17, 2024, *see* Dkt. No. 1167, this Court entered an order pursuant to Rule 41(a)(2) dismissing the plaintiffs' injunctive claims with prejudice and incorporating the Settlement Agreement approved by the Court on February 7, 2024, Dkt. No. 1147. The parties have been in discussions to resolve the claim for attorneys' fees, expenses, and costs without the need for formal application to the Court and need additional time to do so. Accordingly, plaintiffs ask that the Court extend the deadline to submit a stipulation from May 1 until May 15, 2024. Defendants consent to this application.

Thank you for your attention to this matter.

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION

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